

EXHIBIT A

From: Jeremy Wells
Sent: Saturday, October 8, 2022 1:26 PM
To: David Forsh; Laura Davis Jones
Cc: Timothy P. Cairns; Mary F. Caloway; Hamid R. Rafatjoo; Carollynn H.G. Callari
Subject: RE: Mariner adversary (No. 22-50419)
Attachments: 2022-09-27 Doc 121 Joint Status Report.pdf

Given the timeline you are pushing, there is obviously no time for the parties to “reach some broader understanding on the path forward.” In fact, taking time to explore a mutually agreeable path forward (before any risk of discovery costs) was precisely why the parties agreed to continue the status conference in the underlying action until December. I have attached our last joint status report that makes this clear, and I suggest that you get on the same page as your colleagues at Hooper Lundy.

In the meantime, unless you are interested in discussing a compromise date for the hearing/response deadline, we will ask the court to continue the hearing until the dates that I set out below.

Jeremy H. Wells, *Partner*

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From: David Forsh <dforsh@raineslaw.com>
Sent: Saturday, October 8, 2022 12:13 PM
To: Jeremy Wells <jwells@reidcollins.com>; Laura Davis Jones <ljones@pszjlaw.com>
Cc: Timothy P. Cairns <tcairns@pszjlaw.com>; Mary F. Caloway <mcaloway@pszjlaw.com>; Hamid R. Rafatjoo <hrafatjoo@raineslaw.com>; Carollynn H.G. Callari <ccallari@raineslaw.com>
Subject: RE: Mariner adversary (No. 22-50419)

Jeremy,

That is not acceptable to the debtors. These deadlines are on regular notice, and I’ll note that the relief requested in the motion was previewed in our complaint filed on the petition date and, as I understand, by defendants’ counsel in the underlying action.

We will oppose any request to adjourn or continue the bankruptcy hearing. Of course, if the parties reach some broader understanding on the path forward in the underlying action, or if there some language for the proposed order that might resolve an objection without motion practice, we’d be happy to discuss.

Regards,



David Forsh | Partner

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From: Jeremy Wells <jwells@reidcollins.com>

Sent: Saturday, October 8, 2022 12:02 AM

To: Laura Davis Jones <ljones@pszilaw.com>

Cc: Timothy P. Cairns <tcairns@pszilaw.com>; Mary F. Caloway <mcaloway@pszilaw.com>; Hamid R. Rafatjoo <hrafatjoo@raineslaw.com>; Carollynn H.G. Callari <ccallari@raineslaw.com>; David Forsh <dforsh@raineslaw.com>

Subject: RE: Mariner adversary (No. 22-50419)

Given the extremely tight deadlines that you are seeking to impose, I can't wait until next week to see if someone from Raines reaches out.

As I am sure you all know, neither the debtors nor their affiliates are currently incurring any discovery costs in Integra's FCA action, and there is no current deadline to respond to any outstanding discovery requests. Furthermore, the next event in our case isn't until December (at Mariner's urging), and that is merely a status conference. Meanwhile, it is unclear whether my client has even been served with the adversary complaint, and has certainly not had time to determine a substantive response. We have also inquired but have not yet heard back from the United States regarding what position they will take.

Given this uncertainty and the lack of any apparent reason for urgency, we would like to continue the hearing on your motion to enforce the automatic stay until November 18, with objections due 10 days prior. Let me know this weekend whether that will be acceptable to your client or if there is some reason why a hearing on October 25 is necessary. Otherwise, we intend to ask the court to adjourn the hearing on Monday.

Thanks,
Jeremy

Jeremy H. Wells, *Partner*

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TEXAS | NEW YORK | CALIFORNIA | WASHINGTON, D.C.

From: Laura Davis Jones <ljones@pszjlaw.com>

Sent: Friday, October 7, 2022 8:12 PM

To: Jeremy Wells <jwells@reidcollins.com>

Cc: Timothy P. Cairns <tcairns@pszjlaw.com>; Mary F. Caloway <mcaloway@pszjlaw.com>; Hamid Rafatjoo <hrafatjoo@raineslaw.com>; ccallari@raineslaw.com; dforsh@raineslaw.com

Subject: RE: Mariner adversary (No. 22-50419)

Hi Jeremy. Sorry I missed you today. I expect someone from the Raines firm will follow up with you.

Let me know if you need anything further.

Laura Davis Jones

Pachulski Stang Ziehl & Jones LLP

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Los Angeles | San Francisco | Wilmington, DE | New York | Houston

From: Jeremy Wells [<mailto:jwells@reidcollins.com>]

Sent: Friday, October 7, 2022 5:54 PM

To: Laura Davis Jones <ljones@pszjlaw.com>

Cc: Timothy P. Cairns <tcairns@pszjlaw.com>; Mary F. Caloway <mcaloway@pszjlaw.com>; Hamid Rafatjoo <hrafatjoo@raineslaw.com>; ccallari@raineslaw.com; dforsh@raineslaw.com

Subject: RE: Mariner adversary (No. 22-50419)

As I haven't heard back from Laura, I am expanding to the larger group. Is someone available this afternoon/evening to discuss timing of responses to your complaint/motion?

Thanks,
Jeremy

Jeremy H. Wells, *Partner*

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From: Jeremy Wells
Sent: Friday, October 7, 2022 11:07 AM
To: ljones@pszjlaw.com
Subject: Mariner adversary (No. 22-50419)

Laura,

I represent Integra Med Analytics. Are you available this afternoon to discuss timing of responses to your complaint/motion?

Thanks,
Jeremy

Jeremy H. Wells, *Partner*

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